

STATE OF INDIANA)
) SS:
COUNTY OF DELAWARE)

IN THE DELAWARE CIRCUIT COURT

CAUSE NO. AVC NO. 00AVC 083

IN RE: Lucinda Spoonemore, individually,)
 and)
 d/b/a Horizon Promotions,)
)
 Respondent.)

MISCELLANEOUS DOCKET
NO. 18CD-0101-ME03

ASSURANCE OF VOLUNTARY COMPLIANCE

The State of Indiana, by Attorney General Karen Freeman-Wilson and Deputy Attorney General Justin G. Hazlett, and the Respondent, Lucinda Spoonemore, enter into an Assurance of Voluntary Compliance (Assurance) pursuant to Indiana Code § 23-7-8-9.

The parties agree that:

1. Respondent has had her principal place of business at 2022 South Jefferson Street, P.O. Box 1027, Muncie, IN 47308.
2. Respondent has acted as a professional fundraiser solicitor, as defined at Indiana Code § 23-7-8-1 *et seq.*, under both her own name and the name "Horizon Promotions," and has transacted business with Indiana consumers.
3. The terms of this Assurance apply to and are binding upon Respondent, her employees, agents, representatives, successors, and assigns.
4. Respondent's registration as a professional solicitor has lapsed, and she has been unregistered as of July 2, 2000.
5. Respondent pledges that she is not currently conducting any solicitation

campaigns, or otherwise working as a professional fundraiser consultant or professional solicitor, as defined at Indiana Code § 23-7-8-1, *et seq.*

6. Respondent will not act as a professional fundraiser consultant or a professional solicitor in the State of Indiana on behalf of any charitable organization, or solicit charitable contributions from Indiana residents or businesses, unless she first registers with the Consumer Protection Division (the "Division") of the Office of the Indiana Attorney General. Before registering with the Division, Respondent will familiarize herself with all provisions of Indiana law governing professional fundraiser consultants and solicitors, including Indiana Code § 23-7-8-1 *et seq.*

7. Respondent will comply with all the requirements of Indiana Code § 23-7-8-1 *et seq.*, including:

a. Before acting as a professional fundraiser consultant or professional solicitor, Respondent will enter into a written contract with the charity for whom she is to consult or solicit, and will file the contract with the Division. The contract will contain all information required by Indiana law governing professional fundraiser consultants and professional solicitors.

b. Before beginning a solicitation campaign, Respondent will file a solicitation notice with the Division. The notice will include all information required by Indiana law governing professional solicitors.

c. Not later than ninety days after a solicitation campaign, or within the time period otherwise allowed by Indiana law, Respondent will submit a report, in the form prescribed by the Division, setting forth financial information about the campaign as specified by Indiana Code § 23-7-8-2(g).

8. The Office of the Indiana Attorney General has incurred costs in investigating this matter in the amount of Five Hundred Dollars (\$500). Upon Respondent's pledge that she is not currently acting as a professional fundraiser consultant or professional solicitor, the parties agree that such costs shall not become due until and unless Respondent registers as a professional fundraiser consultant or professional solicitor, or violates the terms of this Assurance. Respondent agrees that she will pay these costs to the Office of the Indiana Attorney General within two weeks of when they become due.

9. Respondent will not represent that the Office of the Indiana Attorney General approves or endorses Respondent's past or future business practices, or that execution of this Assurance constitutes such approval or endorsement.

10. Respondent will fully cooperate with the Office of the Indiana Attorney General in the resolution of any future written complaints the Consumer Protection Division receives, as well as in the resolution of any problems identified by the Division related to Respondent's registration or filing requirements under the Indiana laws governing professional fundraiser consultants or solicitors.

11. The Office of the Indiana Attorney General will file this Assurance with the Circuit Court of Delaware County. The Court's approval of this Assurance will not act as a bar to any private right of action.

DATED this 28 day of December, 2000.


STATE OF INDIANA

RESPONDENT

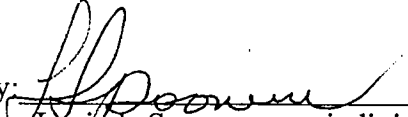
KAREN FREEMAN-WILSON
Attorney General of Indiana

LUCINDA SPOONEMORE

by:


Justin G. Hazlett
Deputy Attorney General
Attorney No. 22046-49

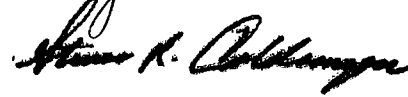
by:


Lucinda Spoonemore, individually
and d/b/a Horizon Promotions

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2022 South Jefferson Street
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APPROVED this 8th day of January, 2000.



Judge, Delaware Circuit Court

